

16-02



Candy.Morin@epa.state.il.us on 11/08/2000 04:43:52 PM

To: mhenry, Rob.Watson, MICHAEL MCATEER, kevin\_de\_la\_bruere cc: EPA4126.PO\_BOL.DO\_BOL, KEVIN TU  
Subject: Re: Solutia Response to Comments - Dead Creek Removal

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Mike McAteer/Everyone,

Here are my thoughts on the subject document:

The action to be taken in response to the requirement to submit a groundwater monitoring program appears to be adequate; but the response does not acknowledge that the requirement is stated in Section V.3.B.6 of the order (as stated in my comment), rather it refers to the section with the O&M Plan. This is apparently the part of the UAO where Solutia believes a conflict exists in the requirement. Enough on that one.

Solutia could certainly provide a more specific list of contaminants in the wastewater at the WGK with very little effort--PCBs, chloroanilines, nitrobenzenes, chlorobenzenes, chlorophenols. They have listed 21 contaminants "known" to be present in the wastewater from Cerro Copper, and then list only 5 that "may" have been in wastewater for the WGK.

It appears from the response that there is no intent to plug and abandon the remaining ten private wells; yet human ingestion of groundwater will be evaluated in the risk assessment as incidental ingestion only via lawn watering and gardening. Does this meet the objectives of the human health risk assessment? Does the human exposure to groundwater via ingestion scenario exist at this site and if it does, is it being fully evaluated as part of the HHRA for the Area 1 Site? (Mike McAteer: maybe you can answer this one)

The other responses are adequate and require no further evaluation.

crm